

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

(DRAFT)

Conditional Major, Construction / Operating

Permit: F-07-032

Custom Tool and Manufacturing Co.

May 21, 2007

Ibrahim AL-Burai, Reviewer

SOURCE ID: 21-005-00022

AGENCY INTEREST: 30

ACTIVITY: APE20070002

SOURCE DESCRIPTION:

Custom Tool and Manufacturing Company is a metal fabrication facility. The facility is classified under SIC code 3537 which is Industrial trucks, tractors, trailers, and stackers.

The emission points include:

- EP1 Paint Booth Operations
- EP2 Steel Grit Blasting Room
- EP3 MIG Welding Operations
- EP4 Washer Stamping and Cleaning Operation
- (I1) Parts Cleaning Booth
- (I2) Various Shop Heaters

COMMENTS:

Type of control and efficiency:

There is no control for the VOC in the plant. The spray booth has exhaust filter to control particulate matter. The estimated control efficiency of the filter is 90%. The estimated transfer efficiency of the spray gun is 85%.

Emission factors and their source:

AP -42 5th edition, and mass balance are used for the emission factors for PM, VOC and HAPS.

Applicable regulation:

- a. **401 KAR 52:030.** Federally-enforceable permits for non major sources.
- b. **401 KAR 59:010,** New Process Operations (applicable to each affected facility associated with a process operation commenced on or after July 2, 1975

EMISSION AND OPERATING CAPS DESCRIPTION:

1. The source has accepted a facility-wide cap on annual individual HAP emission of no more than 9.0 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
2. The source has accepted a facility-wide cap on annual combined HAPS emissions of no more than 22.5 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
3. The source has accepted a facility-wide cap on annual VOC emission of no more than 90 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
4. Per 401 KAR 59:010, the permittee shall not cause, suffer, allow, or permit any continuous emission into the open air from a control device or stack associated with any affected facility (s) which is equal to or greater than twenty (20) percent opacity.
5. Per 401 KAR 59:010, for emission from a control device or stack, no person shall cause, suffer, allow or permit the emission in to the open air of particulate matter (PM) from any affected facility which in excess of 2.34 lb/hr.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.